

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. No. __

**ORDER SUSTAINING DEBTORS' FIFTY-FIRST (SUBSTANTIVE)
OMNIBUS OBJECTION TO CERTAIN DUPLICATE
PROOFS OF CLAIMS (CUSTOMER CLAIMS)**

Upon the fifty-first omnibus objection (the “Objection”)² of FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”), for entry of an order (this “Order”) sustaining the Objection and disallowing and expunging in their entirety the Duplicate Claims set forth in Schedule 1 attached hereto, and this Court having jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Objection in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

² Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Objection.

Objection and the relief requested therein has been provided in accordance with the Bankruptcy Rules and the Local Rules, and that, except as otherwise ordered herein, no other or further notice is necessary; and responses (if any) to the Objection having been withdrawn, resolved or overruled on the merits; and a hearing having been held to consider the relief requested in the Objection and upon the record of the hearing and all of the proceedings had before this Court; and this Court having found and determined that the relief set forth in this Order is in the best interests of the Debtors and their estates; and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Objection is SUSTAINED as set forth herein.
2. Each Duplicate Claim set forth in Schedule 1 attached hereto is disallowed and expunged in its entirety. The claims listed in the column titled “Surviving Claims” identified on Schedule 1 attached hereto shall remain on the claims register, subject to the Debtors’ further objections on any substantive or non-substantive grounds.
3. This Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object to or defend on any basis are expressly reserved with respect to any Duplicate Claims referenced or identified in the Objection that is not listed on Schedule 1 attached hereto.
4. Should one or more of the grounds of objection stated in the Objection be dismissed, the Debtors’ right to object on any other grounds that the Debtors discover are preserved.

5. To the extent a response is filed regarding any Duplicate Claim, each such Duplicate Claim, and the Objection as it pertains to such Duplicate Claim, will constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order will be deemed a separate order with respect to each Duplicate Claim. Any stay of this Order pending appeal by any claimants whose claims are subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.

6. The Debtors are authorized and empowered to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

7. Nothing in this Order or the Objection is intended or shall be construed as a waiver of any of the rights the Debtors may have to enforce rights of setoff against the claimants.

8. Nothing in the Objection or this Order, nor any actions or payments made by the Debtor pursuant to this Order, shall be construed as: (a) an admission as to the amount of, basis for, or validity of any claim against the Debtors under the Bankruptcy Code or other applicable non-bankruptcy law; (b) a waiver of the Debtors' or any other party in interest's right to dispute any claim; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Order; (e) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Debtors' estates; or (f) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.

9. This Order is immediately effective and enforceable, notwithstanding the possible applicability of Bankruptcy Rule 6004(h) or otherwise.

10. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Objection or the implementation of this Order.

Dated: _____
Wilmington, Delaware

The Honorable John T. Dorsey
United States Bankruptcy Judge

SCHEDULE 1

Duplicate Portal Claims

FTX Trading Ltd. 22-11068 (JTD)
Fifty-First Omnibus Claims Objection
Schedule 1 - Substantive Duplicate Claims

Claims to be Disallowed					Surviving Claims							
Claim Number	Name	Debtor	Tickers	Ticker Quantity	Claim Number	Name	Debtor	Tickers	Ticker Quantity			
93251	Name on file	FTX Trading Ltd.	BTC	0.0249956400000000	80694*	Name on file	FTX Trading Ltd.	ADA-PERP	0.0000000000000000			
			ETHW	2.0888821000000000				BTC	0.024995644442310			
			EUR	10,210.0000000000000000				BTC-PERP	0.0000000000000000			
			FTT	16.8000000000000000				CRO-PERP	0.0000000000000000			
			LTC	5.1200000000000000				DENT-PERP	0.0000000000000000			
			SOL	4.9291126000000000				DOT-PERP	0.0000000000000000			
			USD	12,977.27000000000000				ETH-PERP	0.0000000000000000			
								ETHW	2.0888821000000000			
								EUR	10,000.00000000000000			
								FTT	16.8000000000000000			
								LINK-PERP	0.0000000000000000			
								LTC	5.1200000000000000			
								LTC-PERP	0.0000000000000000			
								SOL	4.9291126000000000			
								SOL-PERP	0.0000000000000000			
								USD	12,977.2679136445000000			
								VET-PERP	0.0000000000000000			
								XRP-PERP	0.0000000000000000			
								XTZ-PERP	0.0000000000000000			

Reason: The claim to be disallowed is substantively duplicative of the surviving claim which was ordered modified on the Debtors’ Fourteenth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims).

91534	Name on file	West Realm Shires Services Inc.	BCH	0.000000010000000	56132*	Name on file	West Realm Shires Services Inc.	BCH	0.000000010000000
			BTC	2,505.045100000000000				BTC	15.450304782658600
			SOL	0.000000020000000				SOL	0.000000020000000
			USD	0.000000000000000				USD	-228,929.679439957000000

Reason: The claim to be disallowed is substantively duplicative of the surviving claim which was ordered modified on the Debtors’ Twelfth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims).

91956	Name on file	FTX Trading Ltd.	1INCH-PERP	0.000000000000000	15697*	Name on file	FTX Trading Ltd.	1INCH-PERP	0.000000000000000
			AAVE-PERP	0.000000000000005				AAVE-PERP	0.000000000000005
			APE-PERP	0.000000000007275				APE-PERP	0.000000000007276
			ATLAS	69,904.468000000000000				ATLAS	69,904.468000000000000
			ATOM-PERP	0.000000000000000				ATOM-PERP	0.000000000000000
			AUDIO-PERP	0.000000000000000				AUDIO-PERP	0.000000000000000
			AVAX-PERP	0.000000000000000				AVAX-PERP	0.000000000000000
			AXS-0930	0.000000000000000				AXS-0930	0.000000000000000
			AXS-PERP	-0.000000000000056				AXS-PERP	-0.000000000000057
			BNB	3.760000000000000				BNB	3.760000000000000
			BTC	0.501288620000000				BTC	0.501288620000000
			BTC-0624	0.000000000000000				BTC-0624	0.000000000000000
			BTC-0930	0.000000000000000				BTC-0930	0.000000000000001
			BTC-PERP	0.000000000000001				BTC-PERP	0.000000000000002
			CHR-PERP	0.000000000000000				CHR-PERP	0.000000000000000
			CHZ-0624	0.000000000000000				CHZ-0624	0.000000000000000
			CHZ-PERP	0.000000000000000				CHZ-PERP	0.000000000000000
			DOGE-PERP	0.000000000000000				DOGE-PERP	0.000000000000000
			DOT-PERP	-0.000000000000113				DOT-PERP	-0.000000000000114
			ETH	0.859000000000000				ETH	0.859000000000000
			ETH-0624	0.000000000000000				ETH-0624	0.000000000000000
			ETH-PERP	-0.000000000000001				ETH-PERP	-0.000000000000002
			GALA-PERP	0.000000000000000				GALA-PERP	0.000000000000000
			HOT-PERP	0.000000000000000				HOT-PERP	0.000000000000000
			KSHIB-PERP	0.000000000000000				KSHIB-PERP	0.000000000000000
			LRC-PERP	0.000000000000000				LRC-PERP	0.000000000000000
			LUNC-PERP	0.000000000000000				LUNC-PERP	0.000000000000000
			NEAR-PERP	0.000000000000000				NEAR-PERP	0.000000000000000
			SLP-PERP	0.000000000000000				SLP-PERP	0.000000000000000
			SOL	70.780000000000000				SOL	70.780000000000000
			SOL-0325	0.000000000000000				SOL-0325	0.000000000000000
			SOL-PERP	-0.000000000000056				SOL-PERP	-0.000000000000057
			SRN-PERP	0.000000000000000				SRN-PERP	0.000000000000000
			STMX-PERP	0.000000000000000				STMX-PERP	0.000000000000000
			THETA-PERP	0.000000000000000				THETA-PERP	0.000000000000000
			TRX-PERP	0.000000000000000				TRX-PERP	0.000000000000000
			USD	996.006649786902021				USD	0.006649786902022
			USDT	651,255.0000000000000				USDT	3,779.718521985000000
			USDT-20211231	0.000000000000000				USDT-20211231	0.000000000000000
			VET-PERP	0.000000000000000				VET-PERP	0.000000000000000
			WAVES-PERP	0.000000000000000				WAVES-PERP	0.000000000000000
			ZRX-PERP	0.000000000000000				ZRX-PERP	0.000000000000000

Reason: The claim to be disallowed is substantively duplicative of the surviving claim which was ordered modified on the Debtors’ Fifteenth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims).

92951	Name on file	FTX EU Ltd.	AAVE-PERP	0.000000000000000	54893*	Name on file	FTX Trading Ltd.	AAVE-PERP	0.000000000000000
			ALGO-PERP	178.000000000000000				ALGO-PERP	178.000000000000000
			ALT-PERP	0.000000000000000				ALT-PERP	0.000000000000000
			APE	0.000000002000000				APE	0.000000002000000
			APE-PERP	-0.000000000000085				APE-PERP	-0.000000000000085
			AR-PERP	-0.000000000000067				AR-PERP	-0.000000000000068
			ATLAS	0.000000021468511				ATLAS	0.000000021468511
			ATOM	0.000000000257129				ATOM	0.000000000257129
			ATOM-PERP	-0.000000000000047				ATOM-PERP	-0.000000000000048
			AVAX	0.000000015644559				AVAX	0.000000015644559

80694*: Surviving Claim was ordered modified on the Debtors' Fourteenth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims)
56132*: Surviving Claim was ordered modified on the Debtors' Twelfth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims)
15697*: Surviving Claim was ordered modified on the Debtors' Fifteenth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims)
54893*: Surviving Claim was ordered modified on the Debtors' Twelfth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims)
54893*: Surviving Claim is also included as a Surviving Claim in the Debtors' Forty-Third (Non-Substantive) Omnibus Objection to Certain Superseded Proofs of Claim (Customer Claims)

Claims to be Disallowed					Surviving Claims				
Claim Number	Name	Debtor	Tickers	Ticker Quantity	Claim Number	Name	Debtor	Tickers	Ticker Quantity
			AVAX-PERP	0.000000000000014				AVAX-PERP	0.000000000000014
			BAT	0.00000001418000				BAT	0.00000001418000
			BNB	0.000000026486870				BNB	0.000000026486870
			BNB-PERP	0.000000000000000				BNB-PERP	0.000000000000000
			BOBA	0.000000016355000				BOBA	0.000000016355000
			BOBA-PERP	0.0000000000000397				BOBA-PERP	0.0000000000000398
			BTC	0.0038600000000000				BTC	0.001783022456545
			BTC-PERP	0.0059000000000000				BTC-PERP	0.0059000000000000
			C98	0.000000008571369				C98	0.000000008571369
			CAKE-PERP	0.0000000000000056				CAKE-PERP	0.0000000000000057
			CEL	0.000000003748032				CEL	0.000000003748032
			CHR	0.000000003944943				CHR	0.000000003944943
			CHZ	0.000000004838628				CHZ	0.000000004838629
			CHZ-PERP	0.0000000000000000				CHZ-PERP	0.0000000000000000
			CREAM-PERP	0.0000000000000001				CREAM-PERP	0.0000000000000002
			CRV-PERP	0.0000000000000000				CRV-PERP	0.0000000000000000
			DEFI-PERP	0.0000000000000000				DEFI-PERP	0.0000000000000000
			DENT	0.000000005923246				DENT	0.000000005923246
			DOGE	0.000000005168896				DOGE	0.000000005168896
			DOGE-PERP	0.0000000000000000				DOGE-PERP	0.0000000000000000
			EDEN	0.000000003389769				EDEN	0.000000003389770
			EGLD-PERP	0.0000000000000001				EGLD-PERP	0.0000000000000002
			ENJ	0.000000009679394				ENJ	0.000000009679394
			ENJ-PERP	0.0000000000000000				ENJ-PERP	0.0000000000000000
			ENS	0.0000000060000000				ENS	0.0000000060000000
			ENS-PERP	-0.0000000000000036				ENS-PERP	-0.0000000000000036
			EOS-PERP	-0.0000000000000056				EOS-PERP	-0.0000000000000057
			ETC-PERP	-0.0000000000000007				ETC-PERP	-0.0000000000000007
			ETH	0.0490000000000000				ETH	0.000000023054657
			ETH-0930	0.0000000000000000				ETH-0930	0.0000000000000000
			ETH-1230	0.0000000000000000				ETH-1230	0.0000000000000000
			ETH-PERP	0.0000000000000000				ETH-PERP	0.0000000000000000
			ETHW	0.000000015369075				ETHW	0.000000015369075
			FIDA	0.000000005587992				FIDA	0.000000005587993
			FLUX-PERP	0.0000000000000000				FLUX-PERP	0.0000000000000000
			FTM	0.000000008667251				FTM	0.000000008667252
			FTT	0.0837700000000000				FTT	0.000000020880185
			FTT-PERP	-0.0000000000000142				FTT-PERP	-0.0000000000000142
			GLMR-PERP	0.0000000000000000				GLMR-PERP	0.0000000000000000
			GODS	0.000000011719203				GODS	0.000000011719203
			GOG	0.000000004742935				GOG	0.000000004742936
			GRT	0.000000008355000				GRT	0.000000008355000
			GRT-PERP	0.0000000000000000				GRT-PERP	0.0000000000000000
			HNT	0.000000008063137				HNT	0.000000008063138
			HNT-PERP	0.0000000000000767				HNT-PERP	0.0000000000000767
			HOLY	0.000000008749008				HOLY	0.000000008749008
			IMX	0.000000011348074				IMX	0.000000011348075
			JASMY-PERP	0.0000000000000000				JASMY-PERP	0.0000000000000000
			JOE	0.000000006166220				JOE	0.000000006166220
			KAVA-PERP	0.0000000000000000				KAVA-PERP	0.0000000000000000
			KIN	0.000000012924153				KIN	0.000000012924153
			KSM-PERP	0.0000000000000015				KSM-PERP	0.0000000000000016
			LINK	0.000000027980692				LINK	0.000000027980692
			LINK-PERP	-0.0000000000000039				LINK-PERP	-0.0000000000000040
			LRC-PERP	0.0000000000000000				LRC-PERP	0.0000000000000000
			LTC	0.0000000060000000				LTC	0.0000000060000000
			LUNA2	0.9467825900000000				LUNA2	0.9467825900000000
			LUNA2_LOCKED	2.209159376700000				LUNA2_LOCKED	2.209159376700000
			LUNC-PERP	0.0000000000000000				LUNC-PERP	0.0000000000000000
			MANA	0.000000004793416				MANA	0.000000004793417
			MANA-PERP	0.0000000000000000				MANA-PERP	0.0000000000000000
			MATIC	0.000000025062769				MATIC	0.000000025062769
			MATIC-PERP	0.0000000000000000				MATIC-PERP	0.0000000000000000
			MBS	0.000000003865200				MBS	0.000000003865200
			MER	0.00000000666727				MER	0.00000000666727
			MINA-PERP	0.0000000000000000				MINA-PERP	0.0000000000000000
			MNGO	0.000000014177788				MNGO	0.000000014177788
			NEAR	0.000000006197830				NEAR	0.000000006197830
			NEAR-1230	0.0000000000000000				NEAR-1230	0.0000000000000000
			NEAR-PERP	-0.0000000000000147				NEAR-PERP	-0.0000000000000147
			NEO-PERP	0.0000000000000000				NEO-PERP	0.0000000000000000
			OKB-PERP	0.0000000000000014				OKB-PERP	0.0000000000000014
			ONE-PERP	0.0000000000000000				ONE-PERP	0.0000000000000000
			PERP	0.000000015270441				PERP	0.000000015270442
			PERP-PERP	-0.0000000000000227				PERP-PERP	-0.0000000000000227
			POLIS	0.000000006474261				POLIS	0.000000006474261
			RAY	0.000000007450039				RAY	0.000000007450040
			RAY-PERP	0.0000000000000000				RAY-PERP	0.0000000000000000
			REEF-PERP	0.0000000000000000				REEF-PERP	0.0000000000000000
			REN	0.000000006400000				REN	0.000000006400000
			REN-PERP	0.0000000000000000				REN-PERP	0.0000000000000000
			ROSE-PERP	0.0000000000000000				ROSE-PERP	0.0000000000000000
			RSR-PERP	0.0000000000000000				RSR-PERP	0.0000000000000000
			RUNE	0.000000002125959				RUNE	0.000000002125959
			RUNE-PERP	0.0000000000000020				RUNE-PERP	0.0000000000000020

Claims to be Disallowed					Surviving Claims					
Claim Number	Name	Debtor	Tickers	Ticker Quantity	Claim Number	Name	Debtor	Tickers	Ticker Quantity	
Reason: The claim to be disallowed is substantively duplicative of the surviving claim which was ordered modified on the Debtors’ Twelfth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims).	48712	Name on file	FTX Trading Ltd.	RVN-PERP	0.000000000000000	48706	Name on file	FTX Trading Ltd.	RVN-PERP	0.000000000000000
				SAND	0.000000010243968				SAND	0.000000010243968
				SAND-PERP	0.000000000000000				SAND-PERP	0.000000000000000
				SECO	0.000000012742160				SECO	0.000000012742160
				SHIB	0.00000004695323				SHIB	0.00000004695324
				SLRS	0.000000014487078				SLRS	0.000000014487079
				SNX	0.000000050000000				SNX	0.000000050000000
				SOL	0.000000013889191				SOL	0.000000013889191
				SOL-PERP	-0.000000000000006				SOL-PERP	-0.000000000000006
				SRM	0.000000016534410				SRM	0.000000016534411
				SRM-PERP	0.000000000000000				SRM-PERP	0.000000000000000
				STARS	0.000000007931609				STARS	0.000000007931610
				STEP	0.000000015505206				STEP	0.000000015505206
				STORJ-PERP	0.000000000000000				STORJ-PERP	0.000000000000000
				SUSHI-PERP	0.000000000000000				SUSHI-PERP	0.000000000000000
				TLM	0.000000009600000				TLM	0.000000009600000
				TONCOIN	0.000000021352899				TONCOIN	0.000000021352900
				TONCOIN-PERP	0.000000000000245				TONCOIN-PERP	0.000000000000245
				TRX	0.000798000000000				TRX	0.000798000000000
				TRX-PERP	0.000000000000000				TRX-PERP	0.000000000000000
				TULIP	0.000000005438567				TULIP	0.000000005438567
				UNI-PERP	0.000000000000000				UNI-PERP	0.000000000000000
				USD	1,304.560000000000000				USD	-164.775469367680000
				USDT	0.002716032793383				USDT	0.002716032793384
				WAVES-0624	0.000000000000000				WAVES-0624	0.000000000000000
				WAVES-PERP	0.000000000000000				WAVES-PERP	0.000000000000000
				XMR-PERP	0.000000000000000				XMR-PERP	0.000000000000000
				YFI	0.000000060000000				YFI	0.000000060000000
				ZEC-PERP	-0.000000000000007				ZEC-PERP	-0.000000000000007
Reason: The claim to be disallowed is substantively duplicative of the surviving claim.										
91366	Name on file	FTX Trading Ltd.	BTC	0.000034430000000	79059*	Name on file	FTX Trading Ltd.	BTC	0.000084940000000	
			ETH	0.000993140000000				BTC-20210625	0.000000000000001	
			USD	0.003104800000000				BTC-PERP	0.000000000000057	
			USDT	2,284,267.134126900000000				ETH	0.000993142794902	
								ETH-PERP	-0.000000000000048	
								TRX	518,981.000000000000000	
								USD	0.172137232078666	
Reason: The claim to be disallowed is substantively duplicative of the surviving claim which was ordered modified on the Debtors’ Twelfth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims).										
30599	Name on file	FTX Trading Ltd.	TRX	0.000049000000000	30564	Name on file	FTX Trading Ltd.	BTC	0.569046800000000	
			USD	5,490.420000000000000				ETH	4.725748860000000	
			USDT	4,332.980000000000000				ETHW	1.197080510000000	
								USD	0.770000000000000	
Reason: The claim to be disallowed is substantively duplicative of the surviving claim.										

79059*: Surviving Claim was ordered modified on the Debtors- Twelfth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims)